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Counsel for Defendant Meta Platforms, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
corporation;

Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF ELIZABETH
STAMESHKIN**

Trial Date: None
Date Action Filed: July 7, 2023

1 I, Elizabeth Stameshkin, declare:

2 1. I am a Special Counsel at the law firm of Cooley LLP and counsel to Meta Platforms,
3 Inc. in the above-referenced matter. I have personal knowledge of the facts contained in this
4 Declaration and, if called as a witness, could competently testify to them under oath.

5 2. I understand that the process of collecting and reviewing documents for
6 responsiveness and privilege was and is time consuming. The process requires Meta to first collect
7 custodial files and process them for delivery to an e-discovery vendor. This initial processing is
8 bandwidth constrained by the quantity of materials collected and the volume of Meta's overall e-
9 discovery needs, which are substantial. Accordingly, this first step alone can take up to one week
10 or longer for a single ESI custodian, even if prioritized at the expense of other tasks by the vendor.

11 3. Once that happens, Meta's attorneys must apply search terms to the custodial files
12 followed by a substantive review for responsiveness, and a second level review for privilege. Once
13 all of that is completed, in most cases, at least an additional 48 hours are required to perform a
14 quality control check and process any responsive, non-privileged documents for production; and at
15 least an additional seven to ten days is necessary to complete a privilege log, depending on the
16 volume of privileged materials redacted or withheld.

17 4. It previously took Meta more than eight weeks to collect, review, and produce
18 documents for the 10 custodians it identified, and this did not include privilege logging.

19 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
20 30th day of September at Palo Alto, CA.

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